

Pybus, Brooke  
Page 1 of 1

Sue Kozacek,  
Acting Forest Supervisor,  
Coronado National Forest,  
300 W. Congress,  
Tucson, AZ 85701



Comments opposed to " Tucson Electric Power Sahuarita-Nogales  
Transmission lines- DIES and needed Forest Plan Amendments"

Dear Ms. Kozacek:

I am an Arizona resident and aware of the few, great, sanctuaries this state has to offer to the indigeous wildlife. There are fewer of these areas left in the West. This proposal is just another slight against those remaining areas. All of us enjoy visiting and recreating in these primitive, wild, areas, but, few of us seem to be able to keep them from being "developed" by people with other intentions. The proposed TEP Western Routes and Crossover routes are long, expensive, and the most environmentally damaging, of all the alternatives considered. This route, if approved, would slice through a relatively, untouched, wild, location and forever scar it, and that's only the beginning.

This proposal would result in TEP plowing over 20 miles of new roads through this virgin country. Where there are new roads, there come more motorized vehicles. This new "utility" road will result in a proliferation of subroads, tracks, traffic. This would be another diaster for this remote and rugged wilderness in the state of Arizona and Ornithologists. Southern Arizona is a world class, birders paradise, offering multiple rare and unique species. Road density in the Tumacacori EMA is already above acceptable limits, according to the current Forest Plan. Are we are going to let TEP seed 20 more, new miles, only to watch the proliferation of bushwacking traffic from it, going all points of the compass ?

A Forest Plan Amendment would only decrease the already dwindling supply of remote, high quality, recreational experiences and would impact many sensitive wildlife and plant species that are an important part of our southern Arizona natural heritage and the United States as well.

I DO NOT support this TEP proposed route and URGE you to deny any special use permits for the Western and Crossover Routes because these plans are not compatiable with the current uses of the affected areas.

Respectfully,  
Brooke Pybus  
8002 N. 14th Ave  
Phoenix, AZ 85021

10/6/03

#### Comment No. 1

Refer to the response to Comment 1 in the previous submittal from Brooke Pybus.

#### Comment No. 2

Refer to the response to Comment 2 in the previous submittal from Brooke Pybus.

#### Comment No. 3

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads, and unnecessary project roads would be closed following construction (see Section 4.12, Transportation). The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. TEP would close 1.0 mi (1.6 km) of existing classified road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

Section 3.1.2 states that there is off-highway vehicle use and recreational birding in the project area, and Section 4.1.2 analyzes the potential impacts to these activities. Section 4.1.2 specifically evaluates impacts to ROS indicators such as remoteness and naturalness, both of which would have changes that are "inconsistent" with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

Sections 3.3 and 4.3 present a description of the existing biological resources, including birds and other wildlife, and analyze the potential impacts to these resources

**Comment No. 4**

Refer to the response to Comment 3 above regarding impacts to recreation and biological resources. Analysis of the proposed Forest Plan amendment is contained in Appendix H.

**Comment No. 5**

Sections 3.1 and 4.1 present a description of the existing land use and analyze the potential impacts to these resources from the proposed project.

**Quinlan, Michael**  
**Page 1 of 3**

Tucson Electric Power Sahuarita-Nogales Transmission line  
DEIS

From: Quinlan, Michael [SMTP:mquinl@midwestern.edu]  
To: Pell, Jerry  
Cc:

Subject: Tucson Electric Power Sahuarita-Nogales  
Transmission line DEIS  
Sent: 10/14/2003 1:03 AM  
Importance: Normal

Dear Dr. Pell:

1 I recently learned that Tucson Electric Power (TEP) wishes to construct a 345 kV power line to Nogales, AZ, through environmentally-sensitive parts of southern Arizona. Given the enormous environmental and monetary costs associated with the project, I cannot understand how such a project can go forward under the preferred plans (the "Western Route" and "Crossover Route"). I urge you to: 1) withdraw the current draft Environmental Impact Statement for TEP's proposed 345 kV powerline, and 2) reconsider environmentally-sensitive alternatives that are more in keeping with the needs of Nogales and that do not place an undue monetary burden on the citizens of Santa Cruz County.

2 With respect to the environmental costs of the preferred routes, I was appalled to learn that the powerlines would pass through remote and exceptionally scenic areas in southeastern Arizona. Specifically, the "Western Route" would pass through roadless parts of the Tumacacori and

**Comment No. 1**

Chapter 3 provides a description of the potentially affected environment and Chapter 4 analyzes potential impacts to each resource area.

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

**Comment No. 2**

Sections 3.1, Land Use, and 3.12, Transportation, discuss the existing roads and IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts related to roads.

Sections 3.2 and 4.2 present a description of the existing visual resources and analyze the potential impacts to these resources from the proposed project.

**Comment No. 3**

Section 3.3 presents a description of the existing biological resources, and Section 4.3 analyzes potential impacts to these resources, including potential impacts to special status species.

Quinlan, Michael  
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2 cont.	Atascosa mountains, while the "Crossover Route" would additionally pass through Peck Canyon, the largest and most scenic canyon in the area. Powerlines of the sort proposed by TEP (140' towers) would seriously disrupt the scenic characteristics of these areas and could threaten several of the species with special status that occupy the region (e.g.,
3	jaguars, Mexican spotted owls, Southwestern willow flycatchers, etc.).
	In addition to the environmental issues discussed above, the economics of the proposal are disturbing. My understanding is that the powerline proposal came about because the Arizona Corporation Commission ordered backup power to be made available for Nogales, AZ.
4	However, the proposed 345 kV line would reserve only 20% of its capacity for the needs of Nogales; the remainder would be sold to Mexico. Who will bear the cost of this powerline? Already electrical rates have increased in Santa Cruz County by over 20%, in part to pay for this powerline. Are future increases planned? Is it fair to tax one of the poorest counties in Arizona so that TEP can export power to Mexico? Finally, if Nogales requires additional power, would it not make more sense to construct
5	a new powerplant near Nogales and thereby eliminate the need for powerlines?
6	Finally, I question the wisdom of any project that would link our power grid to the Mexican power distribution system for two reasons. First, I understand that the Constitution of Mexico currently prohibits linkage of Sonora and Sinaloa with the US Western Energy Grid. Why build the powerline if it's currently illegal to connect it to the Mexican grid?

**Comment No. 4**

After a regulated utility such as TEP constructs a project in Arizona, the ACC determines whether, or to what degree, an investment by a utility is recoverable through consumer electricity rates. Because the Federal agencies cannot anticipate how the ACC may adjust consumer electricity rates in light of the proposed project, the potential change in consumer electricity rates is too speculative for inclusion in the EIS.

Low-income populations in the area are identified in Section 3.13, and potential environmental impacts to these populations are analyzed in Section 4.13.

**Comment No. 5**

A new power plant in Nogales is not a viable alternative to a new, second transmission line (part of TEP's proposal). Therefore, the alternative of a new power plant is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

**Comment No. 6**

As part of DOE's decisionmaking process on whether to grant a Presidential Permit for the proposed project, DOE will determine whether the proposed project will adversely impact the reliability of the U.S. electric system. Also, before authorizing exports to Mexico over the proposed 345-kV facilities, DOE must ensure that the export will not impair sufficiency of supply within the United States and will not impede, or tend to impede, the coordinated use of the regional transmission system.

It is not illegal in either the United States or Mexico to connect these two countries' electrical grids.

**Quinlan, Michael**  
**Page 3 of 3**

6 | Second, I think it very unwise for us to link our electrical  
cont. | grid with one that is likely to be even less reliable than our  
own. Will connection with Mexico decrease power  
reliability in Santa Cruz County?

7 | In closing, the draft EIS is clearly inadequate, because it  
does not address important alternatives to TEP's powerline  
which would provide reliable service without destroying our  
environmental and cultural heritage, and which would not  
require huge increases to consumers' electricity bills.

Sincerely,

Michael C. Quinlan  
323 E. Solana Drive  
Tempe, AZ 85281  
Email: mquinl@midwestern.edu

**Comment No. 7**

The Draft EIS was prepared in accordance with Section 102(2)(c) of NEPA, the Council of Environmental Quality (CEQ) regulations (40 *Code of Federal Regulations* [CFR] Parts 1500-1508), and all applicable laws, regulations, and agency policies. The Federal agencies have determined that the Draft EIS does not need to be re-issued for additional review.

**Ragan, Peter**  
**Page 1 of 3**

TEP Sahuarita-Nogales Transmission Line

From: peter ragan [SMTP:sodwinder@yahoo.com]  
To: Pell, Jerry  
Cc:

Subject: TEP Sahuarita-Nogales Transmission Line  
Sent: 10/14/2003 10:36 PM  
Importance: Normal

Dear Mr. Pell,

I am writing concerning the Tucson Electric Power Sahuarita - Nogales Transmission Line EIS. My name is Peter Ragan and I live in Arivaca. I made some comments at a public hearing in Green Valley but would like to add some more.

1 One of the greatest omissions in the EIS is it's failure to consider the impact of the lines on the economies and quality of life of the surrounding communities. Arivaca would be very negatively impacted by this project. Many of the visitors here are coming or going from the Tumacacori EMA. They go there to see the wildlife and the relatively pristine land of the area's interior, just the area crossed by on the line's preferred and crossover routes. Sycamore Canyon is renowned for it's bird watching opportunities and it's diversity of plant and animal life in general. Peck Canyon also has great biodiversity and is a wonderful hike. Arivaca has a bed and breakfast that caters especially to birders and the library here loans binoculars and books for birding and wildlife watching. The construction of these power lines would

#### **Comment No. 1**

Section 3.5 has been revised in the Final EIS to describe the socioeconomic aspects of tourism in the project area, and Section 4.5 has been revised to discuss potential impacts to socioeconomic aspects of tourism.

#### **Comment No. 2**

Sections 3.1.2 and 4.1.2 discuss existing recreational settings and activities, and analyze potential impacts to recreation from the proposed project. Section 4.1.2 specifically evaluates impacts to indicators such as remoteness and naturalness, both of which would have changes that are inconsistent with the existing ROS classes for much of the length of the Western and Crossover Corridors within the Coronado National Forest.

#### **Comment No. 3**

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to threatened and endangered species.

Sections 3.1, Land Use, and 3.12, Transportation, discuss the existing roads and IRAs within the Coronado National Forest. Sections 4.1, Land Use, and 4.12, Transportation, evaluate potential impacts related to roads.

Section 5.2.4 acknowledges the citizen-initiated proposal for an addition to the National Wilderness Preservation System.

Chapter 8 analyzes the proposed project's short-term use of man's environment and the maintenance and enhancement of long-term productivity.

**Ragan, Peter**  
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- 1  
cont. | greatly diminish the wilderness experience in the heart of  
this national forest and significantly reduce it's  
attractiveness to many people who would otherwise pass  
through Arivaca and patronize it's businesses.
- 2 | The quality of life of the people who live in this area is  
directly linked to the beauty of the surrounding lands. The  
people who live in Arivaca inhabit Sycamore Canyon, Peck  
Canyon, Apache Pass, and the foothills of the Tumacacori  
and Atascosa Mountains as much as they inhabit their own  
homes. Even more so, perhaps, as these are the places we,  
and many others form many other places, escape to. To put  
an enormous power line through this area will destroy it for  
many people.
- 3 | The preferred and crossover routes for the proposed power  
line are the most expensive, most difficult, and most  
negatively impactful routes possible. They use the most  
poles and cross the most Endangered and Threatened  
Species habitat. On both the preferred and crossover routes,  
the line would cross the largest remaining unprotected  
roadless area in southern Arizona. Citizens have been  
working since 1998 to make the place a Wilderness Area.  
The people who live near this place and those who would  
come to visit deserve to have it protected. This is in the best  
short and long term interest of the citizens of this area, this  
region and this country.
- 4 | TEP has never shown any need in the U.S. or in Mexico for  
a project of the scale it is proposing. Why do so much  
damage for no purpose? The needs of Nogales can be more  
than adequately met with much less costly and impactful  
alternatives, which, as mentioned in my public comments,

**Comment No. 4**

Section 1.2 of the Final EIS explains the roles of the Federal agencies in developing alternatives for the proposed project. Where an applicant seeks a permit for a particular business project, such as the case with TEP's proposed project, the Federal agencies generally limit their review of alternatives to those that would satisfy the applicant's proposal and decide whether that proposal is or is not worthy of receiving a permit. The Federal agencies do not review alternatives that are not within the scope of the applicant's proposal. Similarly, the agencies do not direct the applicant to alter its proposal; instead, the agencies decide whether a permit is appropriate for the proposal as the applicant envisions it. It is not for the agency to run the applicant's business and to change the applicant's proposal, but only to evaluate the environmental effects of the applicant's business proposal as offered. Accordingly, the EIS evaluates a reasonable range of alternatives, which include the full spectrum of alternatives that would satisfy the applicant's proposal.

**Comment No. 5**

The Federal agencies note the commentor's opinion that DOE should deny a Presidential Permit for the proposed project.

**Ragan, Peter**  
**Page 3 of 3**

4 | were never reasonably considered. I urge the DOE to deny a  
cont. | Presidential Permit on any of the proposed routes and to  
5 | help see that the energy needs of the people of this region  
| are met by practical and cost effective means.

Thank you,  
Peter Ragan



**Ragan, Peter**  
**Page 1 of 2**

----- Forwarded by Susan K Kozacek/R3/USDAFS on  
10/16/2003 06:04 PM -----  
peter ragan <sodwinder@yahoo.com>  
10/14/2003 06:25 PM

To: skozacek@fs.fed.us  
cc:  
Subject: TEP Sahuarita-Nogales Transmission Line

Dear Acting Forest Director,

1 I am writing regarding the Tucson Electric Power  
Sahuarita - Nogales Transmission Line EIS. My name is  
Peter Ragan and I live in Arivaca. I moved here a few  
months ago in large part because of the beauty of the  
very area the proposed power lines would cross on the  
preferred and crossover routes. I have hiked and  
backpacked and camped in this area many times with  
many friends, some of whom are professional botanists  
and archaeologists, and can attest to it's wonderful  
recreational qualities. I enjoy birdwatching and  
studying plants and for these activities, Sycamore  
Canyon is second to none, not just in the area but in  
the state and the entire region. Peck canyon is also  
quite beautiful and a wonderful hike. These places are  
treasures that need to be saved and protected. The  
proposed power lines would significantly adversely  
impact the area, both ecologically and aesthetically.

2 The power line proposes to cut through the habitat  
of no less than 10 federally listed Endangered or  
Threatened species and many dozens of other sensitive  
ones on it's preferred route. None of the routes have  
been more than partially surveyed for cultural

**Comment No. 1**

Chapter 3 describes the affected environment of the area and Chapter 4 evaluates the potential impacts of the proposed project, including potential impacts to the resources (Sections 3.1.2 and 4.1.2, Recreation; Sections 3.2 and 4.2, Visual Resources; and Section 3.3 and 4.3, Biological Resources) and areas cited by the commentor.

**Comment No. 2**

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including impacts to endangered, threatened and special status species, impacts associated with construction noise (e.g., explosives blasting), impacts to birds and wildlife, and invasive species impacts.

Additional field surveys would be conducted by cultural specialists prior to final siting of the ROW and the support structures, in order to minimize impacts to each area of land to be disturbed.

Section 2.2.3, Transmission Line Construction, states that explosives blasting may be used as needed based on local geologic conditions. Explosives blasting can result in the breakup of large rocks. Sections 3.6 and 4.6 present a description of the existing geology and soils and analyze potential impacts to geology and soils as a result of the proposed project.

**Ragan, Peter**  
**Page 2 of 2**

- 2  
cont. artifacts. Construction of the line, with heavy equipment and possible blasting, especially in low, rocky areas such as upper Sycamore Canyon, would cause significant damage to all existing things, living and not, along the route. The area already has too many roads under the existing Forest Plan and the possibility of creating 20 more miles is appalling.
- 3  
2  
cont. Once up, a power line would kill birds, invite invasive weeds, and disrupt wildlife movement generally. The only movement it wouldn't impair is that of illegal vehicles.
- 4
- 1  
cont. Aesthetically, 140 foot tall power poles marching through the most beautiful part of the Tumacacori EMA would be a travesty. It would greatly diminish the experience of wilderness far beyond the footprint of the lines.
- 5 I ask you to please deny any special use permit for the construction of this project and not to amend, and, if anything, strengthen the existing Forest Plan. Thank you.

Peter Ragan.

**Comment No. 3**

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads, and unnecessary project roads would be closed following construction (see Section 4.12, Transportation). The Tumacacori EMA of the Coronado National Forest in and of itself does not exceed road density limits set forth in the Forest Plan. Road density limits set forth in the Forest Plan are for the Coronado National Forest as a whole, not for individual land units or EMAs within the Coronado National Forest. TEP would close 1.0 mi (1.6 km) of existing road for every 1.0 mi (1.6 km) of proposed road to be used in the operation or long-term maintenance of the proposed project, such that road density on the Coronado National Forest would not be affected.

**Comment No. 4**

Section 3.1.2 of the Draft EIS states that there is off-highway vehicle use in the project area, and Section 4.1.2 analyzes the impacts of off-highway vehicle use as one of many recreational uses of the project area, including the Coronado National Forest.

**Comment No. 5**


The Federal agencies note the commentator's opinion that USFS should deny any special use permit for the construction of the proposed project and not to amend the Forest Plan.

**Ragan, Peter**  
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**Comment Nos. 1-10**

Refer to the responses to Peter Ragan in the public hearing transcript from Green Valley, Arizona, September 25, 2003, 7 p.m. to 9 p.m., for each respective comment.


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**The Connection:**  
**Feature Article for October, 2003**  
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**Power Lines and the Tumacacori Highlands**  
by Peter Ragan




My name is Peter Ragan and I live in Arivaca. I moved here six months ago in large part because of the beautiful landscape surrounding the town, including the Tumacacori Ecosystem Management Area, (EMA), of the Coronado National Forest. I've been to Sycamore Canyon many times with many friends, some of them professional archaeologists and botanists. All have expressed fascination and delight with the beauty and diversity of the place. I've visited Peck Canyon several times and hiked up to Apache Pass and out to Bear Grass Tank, north of the pass. It is completely mystifying to me, and to anyone I've talked to, how anyone could contemplate running an enormous power line through this area. Tucson Electric Power Company's preferred western route simply guts the center of the national forest, weaving and dodging so that it can claim that it doesn't affect any wilderness or roadless areas. It's nothing less than an abomination.

1 The crossover route adds insult to abomination by trying run through a vibrant, beautiful canyon, one that has had water and abundant wildlife in it every time I've visited. The central route, while seemingly less impactful, is not fundamentally better than the others. It is a difference of quantity, not quality.

2 Any of the routes would require an amendment to the forest management plan because of their substantial negative impacts to scenic integrity and remoteness in the national forest. But it is the transmission line plan that

3 needs amending or scrapping, not the forest plan. Of the alternatives presented in the DEIS, the no action alternative is the best.

4 Tucson Electric Power Company, (TEP), has grafted its purpose, its desire on to the only real need here, that of increasing electrical reliability to Nogales. TEP is using Nogales' need, and the ACC mandate for improvement, to



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4 cont.	<p>expedite their speculative money making scheme. The DEIS dismisses any suggestion of what may happen in Mexico as speculative. There is nothing more speculative in the DEIS than the concept of selling power to and from Mexico, yet it is taken for granted in the DEIS. There is no legal or technical framework to get power across the border. This speculative business venture, for which there is no present need, should not be allowed to trash the national forest, pretending that it serves a legitimate need, that of Nogales. Many flaws and omissions occur in the DEIS. Examples are:</p>	
5	<p>1) TEP dismisses alternatives out of hand and the DOE seemingly looks the other way. A smaller line down the existing utility corridor is a viable alternative. TEP says it's too close to others and they may all fall prey to the same natural catastrophe. This is no industry standard or construction code. This is an excuse to avoid a simple, inexpensive and efficient alternative. Consideration and analysis of a new power plant in the U.S. near the border was specifically mentioned by the DOE in the federal register of July 10, 2001. In the DEIS, its consideration is dismissed summarily as not serving the purpose of TEP. Which raises the question; is this a TEP document or a DOE document?</p>	
6	<p>2) No consideration is given to the impact of people on the ground, hiking, backpacking, even hunting; using the national forest as it is currently intended. It may come as a shock to TEP or DOE, but many people get out of their cars and hike in this, the central and most beautiful part of the Tumacacori EMA. Between Peña Blanca Lake and Ruby, the area near Sycamore canyon and north is a popular place to camp.</p>	
7	<p>3) This unfamiliarity with leaving the car permeates the DEIS. Time after time, regarding wildlife, regarding plant life, regarding cultural artifacts, the DEIS states no surveys were done or no specific survey information is available. Nobody has gotten out and walked and surveyed most of these routes. Now we are supposed to take this lack of information and make an important, informed decision. How is this possible?</p>	
8	<p>4) The maps for the routes are too vague. The routes should be plotted on USGS 7.5 minute topographic maps, at a minimum.</p>	
9	<p>5) Sycamore Canyon is a candidate for Wild and Scenic River status and, per a recent court decision, is entitled to full protection as such. This is not considered in the DEIS.</p>	
10	<p>6) The negative socioeconomic impact of a large transmission line on any of these routes is not considered. The greatest asset of this area, of this entire region, is its natural beauty. It is the key to the quality of life and to present and future economic prosperity. This transmission line is essentially a taking of a public asset for private gain. It will do much more harm than good on any route. It serves only TEP's interests and seeks to serve Nogales' need only as an afterthought. People come to the national forest, and to the communities surrounding it, for the beauty of its mountains and canyons, not the spectacle of its power lines.</p>	
9 cont.	<p>I ask the federal agencies to do what is best for the area and its people, not simply what is best for TEP. We need to save our public lands and bring forward a better solution to the problem. In the absence of any other</p>	
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3 cont.	<p>reasonable alternatives, please choose the no action alternative. Thank you.</p> <p><a href="#">Printer friendly version</a></p>	
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Rhoades, Diana  
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Diana Rhoades • 425 W. Paseo Redondo Suite 5A • Tucson, AZ 85701 • 520.623.0908

September 23, 2003

Dr. Jerry Pell  
Office of Fossil Energy  
U.S. Department of Energy  
Washington, D.C. 20585  
[Jerry.Pell@hq.doe.gov](mailto:Jerry.Pell@hq.doe.gov)

Re: Tucson Electric Power Sahuarita-Nogales Transmission line DEIS

Dear Mr. Pell:

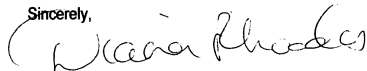
1 I am a new resident in southern Arizona, having moved here from Alaska to enjoy the wild character this landscape has to offer. I am opposed to your current plans to build 20 miles of road through beautiful hills of oak savanna. This area is home to spectacular wildlife including jaguar. How many people get to see a jaguar? Not very many, which is why we need to keep this area wild.

2 I understand TEP proposes to close many of these road miles, but such closures are often unsuccessful. Even when closed, road scars in these fragile arid areas take generations to recover and once built, they will be used by motorized vehicles which will further disturb the jaguar and other wildlife.

3 The Western and Crossover routes slice through a citizen's proposed Wilderness Area and would forever scar the outstanding natural characteristics of the area. A smaller, less obtrusive powerline, such as a 115 kV line was not considered for any route. Why not? A 115 kV line is cheaper, can more easily be buried in sensitive areas near homes, and would serve the long-term needs of Santa Cruz County.

4 I do not support the proposed routes because they do not serve Santa Cruz County's interests, as originally intended under ACC order 62011. It is unfortunate that agencies never actually consider the "no-action" alternative, but this is what is needed in this instance. None of the proposed alternatives are acceptable or will serve the best interests of Santa Cruz County.

Sincerely,



Diana Rhoades  
Southern Arizona Resident

### Comment No. 1

Sections 3.3 and 4.3 present a description of the existing biological resources and analyze the potential impacts to these resources from the proposed project, including potential impacts to jaguar.

The Western Corridor would require construction of approximately 20 mi (32 km) of temporary new roads for construction on the Coronado National Forest, and the Central and Crossover Corridors would require fewer roads. Unnecessary project roads would be closed following construction (see Section 4.12, Transportation).

### Comment No. 2

Regarding the effectiveness of road closures, any authorizationI issued to implement the proposed project on the Coronado National Forest would contain terms and conditions to ensure road barrier effectiveness and maintenance, as appropriate.

Section 3.1.2 of the Draft EIS states that there is off-highway vehicle use in the project area, and Section 4.1.2 analyzes the impacts of off-highway vehicle use as one of many recreational uses of the project area, including the Coronado National Forest.

Refer to the response to Comment 1 above regarding impacts to biological resources.

### Comment No. 3

The citizen-initiated proposal for an addition to the National Wilderness Preservation System is acknowledged in Section 5.2.4.

Section 4.3.2 states that the long-term reductions in biological activity (e.g., lack of vegetation in an area due to construction traffic) tend to be more pronounced in arid areas such as the proposed project area where biological communities recover very slowly from disturbances.

**Comment No. 3 (continued)**

A smaller transmission line (e.g., 115-kV line) in lieu of the proposed 345-kV line would not meet the international interconnection aspect of TEP's proposal and, therefore, is not evaluated in detail in this EIS (refer also to Section 2.1.5, Alternatives Considered But Eliminated From Further Analysis).

**Comment No. 4**

ACC Decision No. 62011 (ACC 1999) mandates the construction of a second transmission line to serve customers in Santa Cruz County, and does not reference the export of electricity to Mexico. However, TEP's stated purpose and need for the proposed project is a dual purpose and need of benefiting both southern Arizona and Mexico.